

Message

---

**From:** Praskins, Wayne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4F47BC0A2C2E42A98347D59CD1A98B19-WPRASKIN]  
**Sent:** 10/8/2020 6:38:11 PM  
**To:** Sanchez, Yolanda [Sanchez.Yolanda@epa.gov]  
**Subject:** FW: EPA review of NAVY Building Remediation Goals  
**Attachments:** draft DH response.docx

Yolanda -

Please take a look at my proposed response to Dan's questions.

Wayne Praskins | Superfund Project Manager  
U.S. Environmental Protection Agency Region 9  
75 Hawthorne St. (SFD-7-3)  
San Francisco, CA 94105  
415-972-3181

-----Original Message-----

From: Daniel Hirsch <[REDACTED] Ex. 6 Personal Privacy (PP)>  
Sent: Tuesday, October 6, 2020 10:57 AM  
To: Praskins, Wayne <Praskins.Wayne@epa.gov>  
Cc: Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Walker, Stuart <Walker.Stuart@epa.gov>  
Subject: EPA review of NAVY Building Remediation Goals

Dear Wayne,

We read with interest your letter of August 20, 2020, to the Navy "EPA Review of Navy Draft Evaluation of Radiological Remediation Goals for Onsite Buildings-Hunters Point Naval Shipyard Superfund Site."

We would appreciate it if you would provide us with the documents providing the basis for:

1. The claims that no contamination could possibly exist on surfaces inside any building higher than 6 feet on walls and none on ceilings.
2. The statement: "Our preliminary calculations using the modified version of the BPRG calculator indicate that the majority of the radiological building RGs remain protective for fixed contamination." We would appreciate if you would also provide the identification of the Remediation Goals (RGs) that are not protective and the comparison of those values with the values the Navy has been using, as well as the comparison of your modified BRPGs against the RGs that you now assert are protective.
3. The statement: "We propose that BPRGs be used as limits on the removable fraction of the radioactivity (i.e., dust). Our preliminary calculations using default exposure assumptions result in BPRGs substantially lower than 20% of the RGs." In addition to providing the documentation for this conclusion, we would appreciate it if you would provide the BPRGs you are proposing for removable radioactivity and the comparison to the RGs the Navy has been using.

Thank you.

Dan Hirsch